Robert R. Rule, d.b.a. Rule Communications 2232 Dell Range Boulevard Cheyenne, WY 82009-4994 (307) 637-7777

February 6, 2006

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

VIA Electronic Filing

Re: Certification of CPNI Filing EB-06-TC-060 EB Docket No. 06-36 FRN: 0001628585

Dear Ms. Dortch:

Transmitted electronically, in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is my certificate of compliance and statement for the year which ended on December 31, 2005.

Yours truly,

Robert R. Rule

Robert R. Rule, d.b.a. RULE COMMUNICATIONS

## **CERTIFICATION**

I, Robert R. Rule, hereby certify this 6th day of February, 2006 that I am the sole proprietor of Rule Communications and that I have first-hand personal knowledge that Rule Communications has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules which are set forth in 47 C.F.R. §§ 64.2001-2009.

Robert R. Rule

Robert R. Rule, d.b.a. Rule Communications

## <u>STATEMENT</u>

Robert R. Rule, d.b.a. Rule Communications ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate
  use of CPNI. Carrier has established the required disciplinary procedures should
  an employee be found to be in violation of the CPNI procedures established by
  Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns
  that use its customers' CPNI. Carrier also maintains a record of any and all
  instances where CPNI was disclosed or provided to third parties, or where third
  parties were allowed access to CPNI, should this ever happen in the future. The
  record will include a description of each campaign, the specific CPNI that was
  used in the campaign, and what products and services were offered as a part of
  the campaign. To date, no such campaigns have been used.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Carrier's sales personnel will obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI. But, from a practical viewpoint, Carrier does not use outside marketing efforts, and thus, most of this does not apply.

Robert R. Rule

Robert R. Rule, dba RULE COMMUNICATIONS